



California Regional Water Quality Control Board

Los Angeles Region



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April 9, 2004

Mr. Eric J. Nemeth, Esq.
Edwards & Angell LLP
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REQUIREMENTS FOR ADDITIONAL SUBSURFACE SOIL AND GROUNDWATER ASSESSMENTS AT FORMER WEBER AIRCRAFT FACILITY, 2820 N. ONTARIO STREET, 2913 N. ONTARIO STREET, AND 3000 SAN FERNANDO BOULEVARD, BURBANK, CALIFORNIA 91504 (FILE NO. 104.1132) (SITE ID NO. 2040110)

Dear Mr. Nemeth:

Regional Board staff have reviewed our files on your site and find that you need to perform additional soil and groundwater assessments. You are therefore required to comply with the following requirements:

1. **SOIL ASSESSMENT:** As stated in your report titled *Drilling at Underground Features* submitted by Woodward Clyde in March 1993, very high concentrations of volatile organic compounds (VOCs) were detected in the soil samples collected from source area borings. The soil samples were collected from 1 foot below ground surface (bgs) to 24 feet bgs in borings DG3, C-10, C-29, C-8, and C-5. As a result of the investigation, 11 impacted soil areas (ISAs) 1 through 11 were identified. Aerial extent of the ISAs were reported in the *Workplan for Investigation of Impacted Soil Areas* dated February 1993. Excavation of some contaminated soil occurred at locations ISA-1, ISA-2, ISA-4, ISA-7, ISA-11, and at the "Former Geophysical Anomaly H" were reported in the *Workplan for Materials Disposition* dated September 1993 which is summarized below:
 - (a) Yellow-stained soil was identified in approximately 1,000 square feet area of ISA-1 during demolition activities and was assumed to extend to a depth of 3 feet bgs. One hundred and ten cubic yards (cy) of impacted soil was later excavated from ISA-1 to a depth of 1-foot bgs.
 - (b) The lateral extent of excavated soil at ISA-2 covers an area estimated to be 670 square feet, but resulted in only an excavation in volume of 25 cy of impacted soil to a depth of 1 foot bgs.

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- (c) No soil was excavated from ISA-3.
- (d) Slight-greenish stained soil was found in ISA-4. An analysis of a soil sample detected as much as 203 milligrams per kilogram (mg/kg) of chromium. As a result, 50 cy of stained soil was excavated to a depth of 1 foot bgs, and two soil samples were collected from one foot below the bottom of the excavation to determine the effectiveness of the excavation. These samples were analyzed to determine the presence or lack thereof with respect to chromium. Chromium concentrations were found to be below response levels, such as the total threshold limit concentration (TTLC) or 10 times soluble threshold limit concentration (STLC).
- (e) No soil was excavated from ISA-5.
- (f) No impacted soil was removed from ISA-6, despite the detection of 429,000 micrograms per kilogram ($\mu\text{g/kg}$) of tetrachloroethylene (PCE) in a soil sample collected from 5 feet bgs, 376,000 $\mu\text{g/kg}$ of PCE in soil sample collected from 9 feet bgs, 135,000 $\mu\text{g/kg}$ of PCE in soil sample collected from 14 feet bgs, and 164 $\mu\text{g/kg}$ of PCE in soil sample collected from 24 feet bgs in boring C-10 located in ISA-6. Similarly, no impacted soil removal was reported from ISA-6, despite detection of 36,600,000 $\mu\text{g/kg}$ of PCE, 70,000 $\mu\text{g/kg}$ of 1,2-cis-dichloroethylene (DCE), and 12,500 $\mu\text{g/kg}$ of ethylbenzene in the 2-foot soil sample from boring C-29 located in ISA-6.
- (g) In addition to the VOCs, mercury (Hg) was also reported at 62.1 mg/kg at 5 feet bgs, 61.4 mg/kg at 9 feet bgs, 28.3 mg/kg at 14 feet bgs, and 77.6 mg/kg at 19 feet bgs in soil samples collected from boring C-10. Some heavy metals such as cadmium (Cd), chromium (Cr), lead (Pb), Copper (Cu), Nickel (Ni), and Hg were also detected in the 2 foot soil sample collected from boring C-29 at concentrations of 90.3 mg/kg, 595 mg/kg, 740 mg/kg, 627 mg/kg, 286 mg/kg, and 6.72 mg/kg, respectively. Many of the above concentrations exceed the United States Environmental Protection Agency's (USEPA) DAF-20 soil screening levels for migration to groundwater that are listed in the preliminary remedial goals (PRG) dated October 2002. You are, therefore, required to determine the lateral and vertical extent of the contaminated soil located in the areas around boring C-10 and C-29, and remove or remediate the source areas.
- (h) Green stained soil was identified during demolition in the immediate area of clarifier C-17 within ISA-7. The areal extent of ISA-7 was estimated to be 2,200 square feet and the depth of impacted soil estimated to be 45 feet bgs. On February 25, 1998, the eastern portion of ISA-7 (the location of clarifier C-17) was excavated. The final excavation measured 18 feet by 14 feet, and was 19 feet deep. A total of approximately 168 cy of impacted soil was transported offsite for disposal. However, the plan for excavating the discolored Cd, Cr, Cu, and Pb impacted soil was not implemented to a

depth of 5 feet bgs for the remaining portion of ISA-7. Cadmium was detected at concentrations of 10 mg/kg and 25 mg/kg in several 2.5-foot soil samples collected from borings B-16 and B-26 (located west of the excavation). Therefore, you are required to determine the lateral and vertical extent of the contaminated soil located in the area around borings B-16 and B-26 and remaining portion of ISA-7, and remove or remediate the source area.

- (i) Cadmium was detected at concentrations of 30.2 mg/kg at 2 feet, 26.1 mg/kg at 6-feet, and 39.8 mg/kg at 11 feet bgs in soil samples collected from boring C-12 located in Building 223 north of ISA-6, but no further investigation was conducted. You are, therefore, required to determine the lateral and vertical extent of the contaminated soil located in the area around borings C-12, and remove or remediate the source area.
- (j) Cadmium was detected at a concentration of 23 mg/kg in the Northeast Vat located in the ISA-8, but no further investigation was conducted. A more detailed investigation is required to delineate the extent of the contaminated soil in the area around the Northeast Vat area, and remove or remediate the impacted soil.
- (k) No removal of impacted soil was reported from ISA-9, despite the detection of 25,200,000 µg/kg of PCE, 923,000 µg/kg of benzene, 632,000 µg/kg of acetone, and 193,000 µg/kg of toluene in the 5 foot soil sample collected from boring DG-3 located in ISA-9. You are, therefore, required to determine the lateral and vertical extent of the contaminated soil located in the area around boring DG-3, and remove or remediate the source area.
- (l) PCE was detected at a concentration of 252 µg/kg at 1 foot, 432 µg/kg at 5 feet, 13,700 µg/kg at 10 feet, and 7,700 µg/kg at 15 feet bgs in soil samples collected from boring C-8 located in the ISA-10. Mercury was also detected in the soil at 1-, 5-, 10-, 15-, 20-, and 25-foot soil samples at concentrations of 72.4 mg/kg, 137 mg/kg, 21.5 mg/kg, 19.5 mg/kg, 22 mg/kg, and 25 mg/kg. Despite the detection of the above contaminants, no contaminated soil excavation or removal action was performed in ISA-10. You are, therefore, required to determine the lateral and vertical extent of the contaminated soil located in the area around the boring C-8, and remove or remediate the impacted soil.
- (m) Stained soils were identified in ISA-11, but no impacted soil was excavated.
- (n) Very high concentrations of VOCs and/or heavy metals were detected in soil samples collected from catch basins C-1, C-2, C-3, C-4, C-5, C-6, and C-7. Although, these catch basins were reported to have been removed, very little is known about the extent of any impacted soil beneath these basins. If soil samples were collected from the

bottom of these catch basins, please submit the analytical results to the Regional Board by **May 14, 2004** to let us determine whether additional data will be required.

- (o) You are required to submit a workplan for additional soil assessment and remediation for the above listed areas to this Regional Board by **May 14, 2004** for review and approval.

2. GROUNDWATER ASSESSMENT:

According to your *Phase II Initial Hydrogeologic Investigation Report* dated February 1991, 5 groundwater monitoring wells including SW-1 and SW-2 (upgradient) and SW-3, SW-4 and SW-5 (downgradient), were installed to a total depth of 260 feet bgs. All five wells were monitored for VOCs semi-annually from May 28, 1997 through to December 17, 1999. As required in our letter dated August 28, 2002, the last groundwater-monitoring event was conducted in December 2002 by your consultant Komex. They collected groundwater samples from the two upgradient wells SW-1 and SW-2. Well SW-4 was inaccessible because a concrete drainage ditch had been constructed over it. Unfortunately, wells SW-3 and SW-5 were dry. The groundwater samples from SW-1 and SW-2 were analyzed for VOCs, heavy metals and emerging chemicals. In order to assist the Regional Board in assessing the groundwater at your site, you are required to replace wells SW-3, SW-4, and SW-5 with groundwater monitoring wells screened at least 30 feet below and 5 feet above the current water table. These 3 replacement wells must be installed within 50 feet and downgradient of their present locations. You are also required to install additional groundwater monitoring wells at the following locations:

- (a) South of the location of former degreaser,
- (b) Between Buildings 214 and W-4,
- (c) Between San Fernando Road and Building W-6,
- (d) Northeast of Building W-7 south of ISA-11.

These 4 new wells will also be designed so that they are screened at least 30 feet below and 5 feet above the current groundwater level. After installation, monitoring of these new and existing wells will provide useful information to assist Regional Board staff regarding the delineation of the VOC, heavy metals, and emerging chemical(s) groundwater plumes. If the plumes have migrated offsite, additional groundwater monitoring wells may be required. You are required to submit a groundwater assessment workplan to the Regional Board by **May 14, 2004** for our review and approval.

Mr. Eric Nemeth, Esqr.
Edwards & Angell, LLP
Former Weber Aircraft

- 5 -

April 9, 2004

3. Continue quarterly groundwater monitoring of the 3 replacement wells and the 4 new groundwater monitoring wells for VOCs, Title 22 heavy metals, and emerging chemicals, and submit quarterly groundwater monitoring reports in accordance with the following schedule:

<u>Reporting Period</u>	<u>Report Due Date</u>
April-June	July 15 th
July-September	October 15 th
October-December	January 15 th
January-March	April 15 th


The next groundwater monitoring report is due by **July 15, 2004**.

4. Include: a) iso-concentration maps for each significant contaminant detected, b) groundwater elevation contour maps, c) groundwater flow direction, and d) hydraulic gradient in each quarterly groundwater monitoring report. Include in each groundwater monitoring report, a summary table containing the depth to groundwater, the surveyed elevation of the top of the well casings, groundwater elevations, total depth and screen interval for each groundwater-monitoring/extraction well.
5. You are required to submit a time schedule for compliance with all the Regional Board requirements in this letter in the revised workplan.

Pursuant to Section 13267(b) of the California Water Code (CWC), you are hereby directed to submit two copies of the technical reports (workplan) in compliance with the above requirements to this Regional Board by **May 14, 2004**. Pursuant to Section 13268 of the CWC, failure to submit the required technical reports, by the due date, may result in civil liability imposed by the Regional Board in an amount not to exceed one thousand dollars (\$1,000) for each day that you fail to comply. The Regional Board can assess these civil liabilities at any time after April 30, 2004, and without further warning.

If you have any questions concerning this matter, please call Mr. Mohammad Zaidi at (213) 576-6732 or Mr. Dixon Oriola at (213) 576-6803.

Sincerely,



Dennis A. Dickerson
Executive Officer

cc: Please see next page.

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- 6 -

April 9, 2004

Mr. Robert Sams, Office of Chief Counsel, State Water Resources Control Board
Ms. Sayareh Amirebrahimi, State Department of Toxic Substances Control, Glendale
Ms. Vera Melnyk Vecchio, California Department of Health Services
— Mr. David Stensby, U. S. Environmental Protection Agency, Region IX
Mr. Mark Mackowski, Watermaster, Upper Los Angeles River Area (ULARA)
Mr. Roger Baker, City of Burbank

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